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\*\*\*\*\*Please make an independent determination whether use of these forms is appropriate\*\*\*\*\*

UNITED STATES DISTRICT COURT  
DISTRICT OF NORTH DAKOTA

Kermit Ty Poulson

(Enter full name of each Plaintiff, above)

vs.

North Dakota Dept of  
Human Services,  
Julie Hoffman

(Enter full name of each Defendant, above)

Civil Case No. \_\_\_\_\_  
(To be assigned by Clerk of Court)

§ JURY TRIAL DEMANDED  Yes  No  
§ (Check one)

## COMPLAINT

I. JURISDICTION. State the grounds for filing this case in Federal Court (include federal statutes or U.S. Constitutional provisions). **SHALEESHA KARPYAK NEVER ABANDONED Marisol MIA Ferrari, THE STATE ALLEGES Abandon to mean UNDER CHAPTER 14-15 1(b)(1).** Shaleesha WITH CARE left Marisol WITH Alydia Ferrari, FOR A BUSINESS ART TRIP TO SAN FRANCISCO, WHILE THERE SHE WAS ASSAULTED, AND SHE SUFFERED A HEAD INJURY. SHE WAS DELAYED IN GETTING BACK BUT SHE DID NOT "ABANDON" Marisol, PURSUANT TO 14-15-03, (2), AN UNMARRIED ADULT CAN ADOPT MARISOL. SINCE JULIE PERFORMED AN ILLEGAL ACTION, Shaleesha was TERMINATED AND NOT ALLOWED RECOURSE AS SHE AS AN UNMARRIED ADULT CAN ADOPT MARISOL. THE STATE VIOLATED THE LAW, Shaleesha NEVER ABANDONED HER, Shaleesha EXPLAINED HER PROLONGED ABSENCE, AND THE CIRCUMSTANCES THAT PROSE IN SAN FRANCISCO; I SOUGHT HER TO

(continued)

come back to Montana, and this matter was done in an illegal manner, Shaleesta did not give consent, AND was NOT ASKED BY SOCIAL SERVICES, BECAUSE C.P.S. AND THE STATE DOOK ADVANTAGE OF A MOTHER WITH A HEAD INJURY AND ALTHOUGH MONTANA ILLEGALLY TERMINATED MY RIGHTS UPON WHICH I SUED IN POULSON V. BULLOCK; CV-17-140-DLC-JCL, AND POULSON V. KARPYAK FOR SLANDER AND ADA VIOLATIONS, CONSENT OF THE BIOLOGICAL FATHER IS REQUIRED. (14-15-05(b)(7), MY RIGHTS WERE ILLEGALLY TERMINATED BY BOB ALISON IN MONTANA WHEN SHALEESTA'S LAWYER USED SLANDER AND DEFAMATION TO SAY THAT MR. POULSON "CANNOT BE A FATHER BECAUSE HE DRAGS HIS FEET." I SUED THEM IN FEDERAL COURT, AND AN ABLEIST JUDGE JEREMY C. LYNCH, THREW IT OUT WITH PREJUDICE, AS HE WAS AN ABLEIST, AND ALLOWED FOR VIOLATIONS OF THE ADA. I HAVE EXPLAINED THIS TO JULIE HOFFMAN AND I JUST WANT TO COMMUNICATE WITH THE FAMILY BEEN DONE TO ME, I WANT JULIE HOFFMAN TO APPEAL THE VALIDATION OF THE ADOPTION DECREE, BECAUSE SHALEESTA NEVER GAVE CONSENT, AND JULIE HOFFMAN'S INVESTIGATION WAS NOT CONDUCTED PROPERLY. SHALEESTA TOLD ME THAT THE STATE JUST "TOOK MARISOL" WITHOUT HER CONSENT. JULIE HOFFMAN HAS FAILED TO LISTEN TO ME, AND HANGS UP ON ME, AND SHE WILL NOT TALK TO SHALEESTA, AND BEING LEFT IN THE CARE OF HER SISTER ALYDIA DOES NOT MEET THE TERM "ABANDON" SHALEESTA HAD NO KNOWLEDGE, OF A RELINQUISHMENT ORDER, AND SHE WAS RECOVERING FROM A TRAUMATIC BRAIN INJURY, AND THE STATE NEVER CONDUCTED A PROPER PROCEDURE, AND ASSUMED SHALEESTA ABANDONED MARISOL, EVEN THOUGH SHE DIDN'T, SHALEESTA HAD NO IDEA, AND JULIE HOFFMAN

Fails to TALK TO HER, OR I ABOUT THE IMPROPER  
PROCEDURE, THE STATE OF NORTH DAKOTA DID TO  
REMOVE MARISOL FROM SHALEESHA KARPYAK.  
Defendant

II. ~~PLAINTIFF~~ For each Plaintiff list: name and address including City, County and State.

1. STATE OF NORTH DAKOTA Dept. of Human Services  
600 E. Boulevard Ave, Dept. 325  
BISMARCK, ND 58505
2. Julie Hoffman  
600 E. Boulevard Ave Dept 325  
BISMARCK, ND 58505

III. ~~DEFENDANT~~ For each Defendant list: name and address including City, County and State.

1. Kermit Ty Pavlson  
1520 E. Burdick Expressway  
MINTON, ND 58701
2. ~~Shaleesha Karpyak~~  
~~111 1111 st sw~~  
~~WATFORD CITY, ND 58854~~
3. ~~Jo-Anne Garman~~  
~~111 1111 st sw~~  
~~WATFORD CITY, ND 58854~~
4. ~~Alydia Ferrari~~  
~~111 1111 st sw, WATFORD CITY, ND 58854~~

IV. CLAIM. State the facts of your claim. Include the name of each person involved, dates and places. Be as specific as possible. Do not give any legal argument or cite any cases or statutes. Use additional sheets of paper if necessary.

Julie Hoffman performed an illegal  
STATE ADOPTION, WITHOUT SHALEESHA'S CONSENT, AND  
DID NOT CONDUCT A PROPER INVESTIGATION, AND LIED  
ABOUT SHALEESHA "ABANDONING" MARISOL WITH HER  
SISTER- Myndia. THE STATE HAS BEEN EXHAUSTED, AS  
JULIE HOFFMAN REFUSES TO ADDRESS THIS, AND WHO  
REFUSES TO LISTEN, AND WHO WILL NOT TELL ME THE  
JUDGE, OR THE COURT, TO ADDRESS THIS ILLEGAL  
MANEUVER, JULIE ALSO KNOWS THE STATE OF MONTANA  
ILLEGALLY TERMINATED MY RIGHTS, BASED OFF OF  
SLANDER, AND DELAMINATION OF CHARACTERS BY AN  
ABLEIST, ADA VIOLATING COURT, AND SHE CALLS  
ME "REARDED," "CRIPPLED," AND TREATS ME LIKE I'M  
IN GRAFTON, ND, AND SHE IS VIOLATING THE ADA.

V. ADMINISTRATIVE PROCEDURES. If applicable, state whether your claim was heard by any administrative agencies; the type of proceedings; the date and place of any proceedings; the outcome of any administrative proceedings.

I HAVE REACHED OUT TO HER, SEVERAL TIMES, WITH EMAIL  
PHONE CALLS, SHE USES BARRIERS OF SILENCE, AND OPPRES-  
SION TO NOT DISCUSS THE ADA VIOLATIONS,  
OF MONTANA, AND SHE REFUSES TO LET ME TALK TO MY  
FAMILY, AND MY DAUGHTER, WHO IS STILL MY  
BIOLOGICAL DAUGHTER, SHE IS VIOLATING MY CIVIL  
RIGHTS, AND PLACING BARRIERS, SHE REFUSES TO  
SAMPLE COMPLAINT TALK TO ME, AND TREAT ME WITH  
DIGNITY, AND INTEGRITY, EVEN THOUGH I JUST  
GOT A COLLEGE EDUCATION FUND FOR MARISOL →

Through the BANK OF NORTH DAKOTA.  
Senator Judy Lee met with me, AND I'M  
FILING THIS LAWSUIT BECAUSE SHE REFUSES TO  
HAVE OPEN DIALOGUE WITH ME, OFFER, ANY KIND OF  
ADVICE, AND SHE'S ACTING FASCISTLY, AND  
LIKE DONALD TRUMP. I SUED STATEFESTA  
AND THE STATE OF MONTANA IN FEDERAL COURT  
SEE 1) POULSON V. KARPYATC, CV:18-160-M-DLC-JCL,  
2) POULSON V. BULLOCK CV: 17-140-M-DLC-JCL,  
AND I'M NOW SUING HER FOR GOING WITH A  
WRONGFUL TERMINATION OF PARENTAL RIGHTS, PLACING  
BARRIERS IN MY WAY, TELLING ME THAT "DISABLED  
FATHERS CANNOT BE DADS", AND STONEWALLING  
ME LIKE I'M A JEW IN AUSCHWITZ, SHE IS  
MEAN, CONDESCENDING, BUREAUCRATIC, HATEFUL, AND  
PLACING BARRIERS BETWEEN ME, AND THE FANNY,  
AND MY BIOLOGICAL DAUGHTER, SHE ILLEGALLY  
PLACED MANSOL IN FOSTER CARE, AND ALSO ILLEGALLY  
ADOPTED HER OUT, SHE IS IN-HUMANE, AND IS  
ACTING LIKE A FASCIST NAZI IN MY LEGAL  
OPINION. SHE DISCRIMINATES ME BECAUSE  
I'M ALLEGEDLY ANTI-FA, TRUMP LOST, I'M  
NOT A REPUBLICAN, AND SHE CLAIMS ANTIFA  
ARE TERRORISTS, BUT WE AREN'T. SO SAID THE  
FBI, AND CONGRESS, AN IDEOLOGY CANNOT  
BE ILLEGAL, YET SHE FOLLOWS A MURDERER TRUMP

She claims to be a "proud girl" and she hates me, she's committing a hate crime, and it needs to stop now.

VI. RELIEF. State what you want the Court to do for you.

1. OPEN DIALOGUE WITH MY ADOPTED DAUGHTER MANSOL MIA FERRARI, AND HER FAMILY
2. \$50K FOR VIOLATING THE ADA.
3. JULIE HOFFMAN TO WRITE AN APOLOGY LETTER STATING THAT "ANTI-FA FATHER'S ARE THE HEROES," AND THAT I AM NOT A TERRORIST.
4. DENOUNCE TRUMP AND THE REPUBLICAN PARTY, AS THEY ARE THE TERRORISTS

GO JOB BIDEN!

VII. SIGNATURE. Each Plaintiff must individually sign this complaint.

Signed this 05 day of AUGUST, 2021

  
Signature of Plaintiff

K. Ty Poulson

Printed Name of Plaintiff

1520 E Burdick Expressway

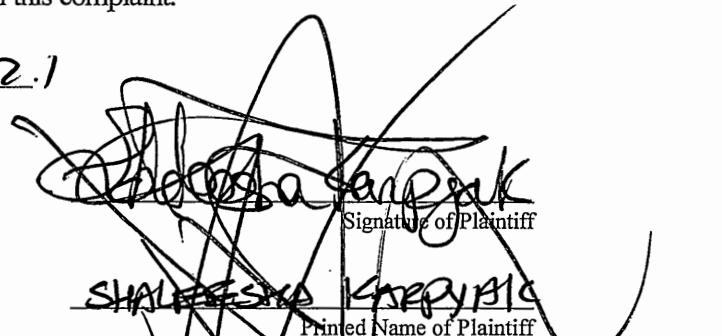
Mailing Address

MINOT, ND 58701

City, State, Zip Code

(406)226-8606

Telephone Number of Plaintiff

  
Signature of Plaintiff

SHALAYSE KREPPEL

Printed Name of Plaintiff

1111 13th

Mailing Address

Watford City, ND 58854

City, State, Zip Code

(406)226-8606

Telephone Number of Plaintiff

SAMPLE COMPLAINT